



PATRICK D. CROCKER
patrick@crockerlawfirm.com

February 18, 2010

Ms. Marlene H. Dortch, Commission Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Filed Electronically Via ECFS

RE: Main Street Telephone Company
Customer Proprietary Network Information Certification
EB Docket No. 06-36

Dear Ms. Dortch:

Main Street Telephone Company, by its undersigned attorneys, hereby submits its 2009 CPNI Compliance Certificate and Accompanying Statement certifying compliance with Section 64.2001 *et seq.* of the Commission's rules.

Please contact the undersigned should you have any questions or concerns at (269) 381-8893 extension 226 or patrick@crockerlawfirm.com.

Very truly yours,

CROCKER & CROCKER, P.C.


Patrick D. Crocker

PDC/tld

Enclosures

cc: Best Copy and Print, Inc. (via e-mail FCC@BCPIWEB.COM)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 18, 2010

Name of Company Covered by this Certification: Main Street Telephone Company

Form 499 Filer ID: 823582

Name of Signatory: Thomas J. Glynn

Title of Signatory: President

I am the President of Main Street Telephone Company and as such do hereby certify, affirm, depose, and say that I have authority to make this Customer Proprietary Network Information ("CPNI") Annual Certification of Compliance on behalf of Main Street Telephone Company. I have personal knowledge that Main Street Telephone Company has established adequate operating procedures to ensure compliance with the Commission's CPNI rules as set forth in 47 C.F.R. § 64.2001 et. seq.

Attached to this Certification is an Accompanying Statement explaining how the company's procedures ensure compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

Main Street Telephone Company received no customer complaints in the past year concerning the unauthorized release of CPNI. Further, Main Street Telephone Company has taken no action against data brokers for the unauthorized release of CPNI during calendar year 2009. Main Street Telephone Company will report any information it may obtain with respect to the processes pretexters are using to attempt to access CPNI and what steps Main Street Telephone Company is taking to protect CPNI.

This Certification is dated this 16th day of February, 2010.



Thomas J. Glynn
President
Main Street Telephone Company

ACCOMPANYING STATEMENT

Main Street Telephone Company's ("Main Street") operating procedures ensure that Main Street is in compliance with the requirements set forth in the Commission's CPNI rules as set forth in 47 C.F.R. Part 64, Subpart U (the "**CPNI Rules**") as follows:

- Main Street's operating procedures prohibit the use, disclosure or release of CPNI, except as permitted or required under 47 U.S.C. § 222(d) and Rule 64.2005. Main Street does not use disclose or permit access to CPNI for any purpose (including marketing communications-related services) and does not disclose or grant access to CPNI to any party (including to agents or affiliates that provide communications-related services), except as permitted under 47 U.S.C. § 222(d) and Rule 64.2005.
- Main Street's operating procedures prohibit the use of CPNI in sales or marketing campaigns. Main Street does not use, disclose or grant access to CPNI for any purpose, to any party or in any manner that would require a customer's "opt in" or "opt out" approval under the Commission's CPNI Rules. Main Street does not currently solicit "opt in" or "opt out" customer approval for the use or disclosure of CPNI.
- Main Street takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Main Street's operating procedures include safeguards designed to identify and protect against unauthorized use, disclosure or access to CPNI. Main Street authenticates a customer prior to disclosing CPNI based on customer-initiated telephone contact or an in-store visit.
- Main Street maintains a record of all instances where CPNI was disclosed or provided to third parties and where third parties were permitted access to CPNI. Records of all instances where CPNI was disclosed or provided to third parties, or where third parties were permitted access to CPNI, are maintained for a minimum of one year.
- Main Street does not release call detail CPNI over the telephone, based on customer-initiated telephone contact, unless the customer first provides a password that is not prompted by Main Street asking for readily available biographical information or account information or unless the customer is able to provide the relevant call detail information without Main Street assistance. If a customer does not provide a password and is not able to provide the relevant call detail information without Main Street assistance, Main Street only discloses call detail CPNI by sending it to an address of record or by calling the customer at the telephone number of record.
- Main Street provides customers with access to CPNI at Main Street's retail locations only if the customer presents a valid photo ID and the valid photo ID matches an authorized name on the customer account. If a customer is not able to provide a valid photo ID, he or she may instead provide the account password in the same manner required for customer-initiated telephone contact. If a customer is not able to provide a valid photo ID or account password in connection with an in person inquiry, Main Street only discloses call detail CPNI by sending it to an address of record or by calling the customer at the telephone number of record.

- Main Street has established a system of passwords and password protection. For a new customer establishing service, Main Street requests that the customer establish a password at the time of service initiation. For existing customers to establish a password, Main Street must first authenticate the customer without the use of readily available biographical information or account information, for example by calling the customer at the telephone Number of record or by using a personal identification number (PIN) or similar method to authenticate a customer.
- If a customer password is forgotten or lost, Main Street uses a backup customer authentication method that is not based on readily available biographical information or account information.
- If a customer does not want to establish a password or if a password is lost or forgotten without subsequent authentication of the customer, the customer may only access call detail information based on a customer-initiated telephone call by asking Main Street to send the call detail information to an address of record or by Main Street calling the customer at the telephone number of record. If a customer does not want to establish a password or if a password is lost or forgotten without subsequent authentication of the customer, the customer may only access call detail information based on personal inquiry at a retail location by providing a valid photo ID that matches an authorized name on the customer account or by asking Main Street to send the call detail information to an address of record or by Main Street calling the customer at the telephone number of record.
- Main Street has procedures and policies in place to notify a customer immediately when a password, customer response to a back-up means of authentication, address of record or other critical account information is created or changed.
- Main Street does not currently provide online account access to customers.
- All Main Street employees with access to or a need to use CPNI have been trained regarding Main Street's operating procedures and as to when they are and are not authorized to use, disclose or permit access to CPNI. Main Street's employees have been trained regarding the types of information that constitute CPNI and Main Street's safeguards (such as employee restrictions, password protection, supervisory review, etc.) applicable to Main Street's handling of CPNI. Main Street's employee manual includes a disciplinary policy requiring compliance with Main Street's operating procedures and sets forth penalties for noncompliance, up to and including termination of employment.
- Main Street has appointed a compliance officer and established a supervisory review process regarding Main Street's compliance with the Commission's CPNI Rules. Main Street's operating policies require that employees confer with the compliance officer if they are unsure about any circumstances or situations involving the potential use, disclosure or release of CPNI. Main Street's operating policies require that the compliance officer confer with Main Street's legal counsel if he or she is unsure about any circumstances or situations involving the potential use, disclosure or release of CPNI.

- Main Street's compliance officer has personal knowledge of Main Street's operating procedures and is authorized, as an agent of Main Street, to sign and file an annual CPNI compliance certification with the Commission.
- All Main Street employees and the compliance officer are trained to identify and protect against activity that is indicative of pretexting. All Main Street employees and the compliance officer are required to report any breach or potential breach of CPNI safeguards and/or any customer complaints regarding CPNI. In the event of a CPNI breach, Main Street's operating procedures require compliance with the Commission's CPNI Rules regarding notice to law enforcement and customers. Main Street must maintain records of any discovered breaches and notifications to the Secret Service and the FBI regarding those breaches, as well as the Secret Service and the FBI responses to such notifications, for a period of at least two years.